

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Attorney for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; and Siculus, Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

DECLARATION OF JULIAN LAMM

1 I, Julian Lamm, declare:

2 1. I am a Partner with the law firm White & Case LLP (“White & Case”). I and members of
3 my team serve as outside counsel for Meta Platforms, Inc. (“Meta”). I base this declaration upon my
4 personal knowledge and could and would testify to the following facts if called to do so.

5 2. In my capacity as outside counsel for Meta, I and members of my team have represented
6 Meta in connection with regulatory compliance advice. As part of the representation, White & Case has
7 analyzed a wide variety of existing and proposed regulations in foreign and domestic jurisdictions,
8 including the European Union, the State of California, and others. In particular, White & Case has advised
9 Meta about potential regulatory risks and strategies to mitigate those risks, including in particular risks
10 surrounding the use of Meta’s services by individuals under the age of 18 (“youth users”).

11 3. In and around the spring of 2022, Meta’s in-house counsel, Rachany Son, asked White &
12 Case to provide legal advice for what Meta referred to as a Youth “State of the Union.” I and members
13 of my team—including Christina Dolen, Alexus Payton (now Alexus Payton Leach), and John Oltean—
14 prepared legal analyses for Meta relating to existing and proposed regulations focused on youth users of
15 social media services.

16 4. Part of these analyses involved reviewing existing and proposed regulations in various
17 jurisdictions as of spring 2022. We assessed those regulations’ potential application to Meta, and provided
18 legal advice to Meta on strategies to promote compliance and mitigate regulatory and enforcement risk.
19 As part of its analyses, we reviewed certain aspects of Meta’s services, including Facebook, Instagram,
20 Messenger, and others. We also reviewed public-facing disclosures and then-existing product
21 functionalities offered by other companies and services in order to advise Meta on potential future
22 enforcement activity from regulators.

23 5. I have reviewed time records from the spring of 2022, and I can confirm that I and the
24 individuals on my team spent over 350 hours from March 2022 through August 2022 carrying out this
25 specific legal advice, including in email correspondence, memoranda, and video calls with Meta.

26 6. I understand Ms. Son and other members of Meta’s in-house counsel were involved in the
27 creation of certain slide decks relating to the youth legal and regulatory landscape, and that these slide
28

1 decks were prepared to provide advice to senior management on these issues. I recall reviewing,
2 commenting on, and drafting contents of these internal Meta presentations during this period.

3 7. I have reviewed four such slide decks identified at the following Bates numbers:

Original Bates	Re-produced with Redactions
META3047MDL-035-00002871	META3047MDL-085-00000104
META3047MDL-035-00004050	META3047MDL-085-00000271
META3047MDL-073-00001477	META3047MDL-085-00000211

7 8. In the slides contained in these decks, I recognize conclusions and descriptions we had
8 provided regarding existing and proposed regulations in foreign and domestic jurisdictions. These
9 conclusions and descriptions were specifically contained within the redacted portions of the presentations,
10 which I have also reviewed. These conclusions and descriptions are substantively similar to those that
11 White & Case had provided about regulatory risk, as described above. From my perspective, these
12 conclusions and descriptions appear to incorporate or otherwise reflect the legal advice we had provided
13 to Meta.

14 9. In particular, I recognize, within the redacted portions of the presentations, charts and
15 tables that are similar to the ones White & Case was asked by Ms. Son to create. These charts and tables
16 reflect the assessment and legal judgment of White & Case attorneys regarding compliance with existing
17 and anticipated future regulations in foreign and domestic jurisdictions, and in particular, our legal
18 judgment of areas of potential enforcement risk.

19 I declare under penalty of perjury the foregoing is true and correct. Executed on November 23,
20 2024 at Los Angeles, California.

21 DocuSigned by:
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23 Julian Lamm
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